



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
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March 2, 2011

Mr. Mike Spites, Eglin Air Force Base (AFB)
Public Affairs Office,
101 West D. Avenue, Suite 110
Eglin Air Force Base, Florida 32542-5499

Subject: 4th Draft Environmental Impact Statement (DEIS) for
Military Family Housing Demolition, Construction, Renovation, and
Leasing (DCR&L) Program at Eglin AFB and Hurlburt Field, Florida

Dear Mr. Spites:

Consistent with our responsibilities under Section 309 of the Clean Air Act and Section (102)(2)(c) of the National Environmental Policy Act (NEPA) of 1969, The U.S. Environmental Protection Agency (EPA), Region 4 has reviewed the above RDEIS 4th Edition for the proposed DCR&L Program at Eglin AFB and Hurlburt Field, Florida and is providing the following comments for your consideration in the development of the Final Environmental Impact Statement (FEIS).

The RDEIS states that:

Responsible Agency: U.S. Air Force

Cooperating Agencies: None

Proposals and Actions: This Draft Environmental Impact Statement (DEIS) describes the potential consequences to the human and natural environment from the implementation of various alternatives for implementing the Military Housing Privatization Initiative (MHPI) at Eglin Air Force Base (AFB) and Hurlburt Field, Florida.

Proposed Action – The Air Force proposes to implement MHPI at Eglin AFB and Hurlburt Field through conveyance of all existing housing units (up to 1,413) distributed throughout Eglin AFB and Hurlburt Field, including infrastructure, utility connections, and housing offices, to a private development and property management company. The developer would demolish up to 1,404 dwellings and then construct up to 1,477 new units; up to 35 units for Camp Rudder (for all alternatives except Sub alternative 2a), up to 548 units for Hurlburt Field (484 units would be constructed at Hurlburt Field for all

alternatives), and up to 929 units for Eglin AFB (depending on the alternative selected).

The developer would also return units and associated structures within two Historic Districts located at Georgia Avenue and Camp Pinchot to the Air Force for purposes other than residential housing (e.g., offices, meeting places) once replacement units are constructed. At completion of the project, a developer would own and operate 1,477 units on behalf of Eglin AFB and Hurlburt Field. The Hurlburt Family Camping facility would also be relocated. All land areas supporting housing would be leased to the developer for 50 years, except for the parcels with the historic housing, which would be short-term leases.

Alternatives

Alternative 1 (White Point Area) – Construction of up to 1,477 housing units with 548 units on Hurlburt Field, 35 units at Camp Rudder, and 894 units on Eglin Main Base utilizing a combination of seven parcels within the White Point Area.

Alternative 2 (Eglin Main Base/Valparaiso Area) – Construction of up to 1,477 housing units with 484 units on Hurlburt Field, 35 units at Camp Rudder, and 958 units on Eglin AFB utilizing one or a combination of 11 parcels located at Eglin Main Base and in Valparaiso.

Sub alternative 2a (Eglin Main Base): Preferred Alternative – Construction of up to 1,477 housing units with 484 units on Hurlburt Field and 993 housing units on Eglin AFB utilizing Parcel 1 on Eglin Main Base and no Valparaiso parcels. No units would be built at Camp Rudder.

Alternative 3 (North Fort Walton Beach Area) – Construction of up to 1,477 housing units with 484 units on Hurlburt Field, 35 units at Camp Rudder, and 958 units on Eglin AFB utilizing a combination of five parcels within the North Fort Walton Beach Area.

Alternative 4 (Mix Alternative) – Construction of up to 1,477 housing units on Eglin AFB through utilization of a combination of parcels within any of the areas identified in Alternatives 1–3.

No Action Alternative – The Air Force would not implement the Proposed Action at Eglin or Hurlburt Field. Instead, the Air Force would continue to manage/maintain and replace/upgrade military family housing (MFH) in accordance with existing Air Force policy and resources.

The Air Force intends to privatize its housing at Eglin AFB and Hurlburt Field (Figure ES-1) under a statutory program to allow it to meet its military housing requirement. This is referred to as the Military Housing Privatization Initiative, or MPH. This initiative is accomplished by using the National Defense Authorization Act for Fiscal Year (FY) 1996 (Public Law 104-106, 110 Stat., 186 Section 2801) as amended, which includes a series of authorities that allow the Department of Defense (DoD) to work with the private sector to build and renovate military housing (these authorities were made permanent in FY 2005). The DoD's goal is to obtain private capital to leverage government dollars or land contributions, make efficient use of limited resources, and use a variety of private-sector approaches to build and renovate military housing faster and at a lower cost to American taxpayers. Additional information about housing privatization can be found at: <http://www.acq.osd.mil/housing/legislation.htm>.

At completion of the project, a developer would own and operate 1,477 units on behalf of Eglin AFB and Hurlburt Field. All construction and demolition activities would occur on Eglin AFB and Hurlburt Field (Air Force-owned) property. The Air Force would lease the real property underlying the units proposed for demolition to the developer. For areas not designated for rebuilding, this lease would last only until demolition is complete, at which time the developer's lease would end. For areas designated for rebuilding, the real property parcel would be leased to the developer for a period of 50 years from the date of the transaction.

Military family housing (MFH) privatization (10 USC 2871–2885, as amended) is a process wherein the Air Force would receive proposals from interested developers outlining their qualifications and proposals for meeting the development requirements through detailed design and construction, property management, and financial management.

EIS Process to Date

This document constitutes the fourth iteration of the EIS. The first iteration of the Draft EIS was published and released to the public in April 2005; the Air Force's Preferred Alternative involved the demolition of the Camp Pinchot Historic District. The Air Force revised the Draft EIS in response to public and agency comments from the initial public hearing process, changing the Preferred Alternative to allow for adaptive reuse of the Camp Pinchot Historic District, and then released that document to the public as the Revised Draft EIS in April 2006. The Air Force received public and agency comments on that iteration. Before the 2006 EIS was finalized, several circumstances arose that caused the Air Force to halt the finalization of the EIS and reevaluate the proposed action.

Base realignment and closure (BRAC) decisions resulted in the planned beddown of the Joint Strike Fighter (JSF) (i.e., the F-35 aircraft), the U.S. Army 7th Special Forces Group (Airborne), and a net of approximately 4,000 additional military, civilian, and contractor personnel (not including family members) at Eglin AFB. Many of the additional personnel will be students. As a result, the Air Force needed to conduct a new housing requirements analysis in light of the changes in personnel. Additionally, rising costs due to recent hurricanes during that period made the utilization of parcels outside the Eglin AFB and Hurlburt Field main base areas (e.g., Camp Pinchot and Poquito Bayou Expansion areas) financially unreasonable. Consequently, the Air Force revised the scope of the MHPI at Eglin AFB and Hurlburt Field to consider these factors. The third iteration of the Draft EIS analyzed the potential consequences from the Proposed Action explained above and in Section 2.1 of that iteration of the EIS. There was no housing alternatives outside the main base areas of Eglin AFB or Hurlburt Field. This was due to a shortfall in project financials associated with hurricane-related increases in construction insurance costs, as well as reassessment of sitting new housing or demolishing historic units at Camp Pinchot due to environmental and historic requirements and public opposition. The total number of housing units was adjusted to

reflect the new housing requirements analysis that included changes in personnel associated with the BRAC actions and changes in the local housing market. The Air Force determined that the potential existed for new JSF alternatives introduced during the JSF NEPA process to negatively affect the MHPI Preferred Alternative. Consequently, the Air Force was forced to reevaluate its MHPI concept to identify other housing areas that meet Air Force MHPI housing objectives while those JSF alternatives were examined. In addition, the previous hurricane-related increases in construction insurance costs started to decline, and previously precluded locations could once again be considered.

This fourth iteration of the EIS describes the changes in the alternative development process, reconsideration of the impacts of current construction costs on alternative feasibility, new alternatives resulting from this process, and the potential impacts to the subsequent affected environment from the MHPI. Table ES-1 provides a summary of the changes in alternatives that are analyzed in this fourth iteration of the MHPI EIS versus the previous three iterations. All alternatives in this iteration include 484 units on Hurlburt Field; up to 35 units at Camp Rudder (except Sub alternative 2a); with 958 to 993 units at locations dependent on alternative selection: Alternative 1 – White Point Area (416 acres); Alternative 2 – Eglin Main Base/Valparaiso Area (1,071 acres, including development buffers/setbacks); Sub alternative 2a – Eglin Main Base (the Air Force's Preferred Alternative) (673 acres, including development buffers/setbacks); Alternative 3 – North Fort Walton Beach Area (457 acres, including development buffers/setbacks); and Alternative 4 – Mix Alternative (a mix of parcels from any of the previous alternatives). The entire existing housing project area is shown in Figure ES-1.

Need for the Proposed Action

Need for Privatization

A Quality of Life Task Force report concluded that the continuing decline in the quality of existing on-base military housing, an increase in the out-of-pocket expenses for service members living in private housing, and increased demands on service members and their families (such as more deployments and family separations) could result in potential adverse impacts to military readiness. The uncertainty of the continued availability of traditional funding (including Military Construction [MILCON] and Operations and Maintenance sources) and increasing doubts as to the economic feasibility of this traditional funding forced the Air Force to meet this need by changing its policy. Congress authorized privatization through the National Defense Authorization Act of 1996, which enabled the DoD to rely on private sector housing developers to renovate or demolish existing housing units, build new ones, provide the infrastructure needed to support such developments, and operate, maintain, and manage the housing development on Air-Force owned or project-funded property for up to 50 years.

EPA COMMENTS TO 2010 DEIS (4th REVISION)

1. The EPA comments made to the 2005 DEIS, 2006 DEIS and the 2008 DEIS still apply to the scope of work for this 4th 2010 DEIS revision.
2. Ensure Federal Regulations that establish requirements during renovation, repair and painting activities that disturb lead-based paint is followed.
3. Ensure all projects repairs and rehabilitation should comply with the FEMA regulations and guidelines.
4. Ensure Federal regulations are observed before spending money in flood plain locations
5. Ensure owners can afford the flood insurance after the property is rehabilitated.
6. Ensure the project complies with local, state and federal asbestos requirements.
7. The Green Buildings category - Many activities at construction sites can impact air quality, including operation of diesel engines, open burning, land clearing, and demolition. Air pollution rules applicable to constructions sites are contained in federal, state and local regulations and ordinances. These rules must be followed during construction.
8. Permits information - Contact the appropriate Federal, State, County or City officials regarding permits and local ordinances.
9. Open Burning - The burning of materials for waste disposal purposes is referred to as open burning. Open burning permits and/or specific federal, state and local standards must be followed.
10. THE CONSTRUCTION INDUSTRY COMPLIANCE ASSISTANCE CENTER (CICA CENTER) cicacenter.org is your source for plain language explanations of environmental rules for the construction industry. This information is provided free of charge by the [National Center for Manufacturing Sciences](http://www.nmfs.gov). Funding for this project has been provided by the [U.S. Environmental Protection Agency](http://www.epa.gov).

Enclosed you will find a check list of items that could help facilitate your compliance with the NEPA and cross-cutters regulations.

The EPA supports your projects and we thank you for the opportunity to provide comments for your consideration. Should you have questions regarding our comments, please contact Rafael Santamaria at (404) 562-8376 or at santamaria.rafael@epamail.epa.gov of my staff.

Sincerely,



Heinz Mueller, Chief
NEPA Program Office

Enclosure

ENVIRONMENTAL PROTECTION AGENCY REGION 4
NEPA CHECK LIST

Consistent with our responsibilities under Section 102(2)(C) of the National Environmental Policy Act and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA), Region 4 offers the following general comments/suggestions for your consideration/inclusion that could help facilitate your compliance with the NEPA regulations in this project and in future Draft Environmental Impact Statement (DEIS), Draft Environmental Assessment (DEA) and/or Final Environmental Impact Statement (FEIS) for the **4th Draft Environmental Impact Statement (DEIS) for Military Family Housing Demolition, Construction, Renovation, and Leasing (DCR&L) Program at Eglin AFB and Hurlburt Field, Florida:**

1. DEA development must be consistent with Section 309 of the Clean Air Act
2. Should include clear conclusions why the Preferred Alternative was selected. The "Preferred Alternative" should be individually evaluated, i.e., without solely referencing to the impacts attendant to other alternatives.
3. The DEA should have a complete list of abbreviations, definitions, acronyms and symbols
4. Similar subjects/terminologies should be cross-referenced with like definition shown/found on other document's pages.
5. The DEA should be specific and describe what facilities or portions of the facilities will be demolished and when. Any deconstruction (demolition) should be done according to the state Historic Preservation Officer (SHPO), the National Historic Preservation Act (NHPA)'s rules, regulations and guidelines and should ensure disposal of federal property is done according to federal regulations for disposal of federal property. Ensure the demolition and construction debris be properly handled by licensed contractors (if needed) and disposed in licensed sanitary landfills for each type of debris.

In construction/demolition projects the DEA should address: proper handling of hazardous materials removal and disposal (asbestos, PCBs, lead from paint), and waste management (e.g., reuse or recycling as opposed to landfill dumping); wastewater management, indoor air quality, energy and water conservation (e.g., low flow toilets, energy efficient windows and doors, efficient lighting, etc.); other pollution prevention measures (e.g., use of materials with recycled content) as well as impacts to noise, traffic, air and water quality, wildlife and vegetation (could any endangered or threatened species be impacted?), erosion, sedimentation control, and impacts to historic resources.

6. The DEA and draft Finding of No Significant Impact (FNSI) should be made available for public inspection at various public locations. It would be very beneficial to ensure the public is well informed at all times through frequent public meetings, flyers, announcements and public hearings.
7. The DEA should address the needed and required permits, how to obtain them from the associated regulatory agencies and how to implement and comply with them.
8. The DEA should address land cleared or forested clear-cut harvested trees and should describe the type and age of trees present; will the trees be harvested? Concerning cumulative

impacts, recently (in the near past/present/future) how many other sites and cumulative number of acres of land will or have been cleared at the facility?

9. The DEA should make sure decisions made based on archaeological surveys done in previous years are still valid.

10. The DEA should address impacts to traditional American Indian resources, if any, under the various alternatives. Consultation with the American Indian Tribes/organizations should be made and it should include a list of Tribes and or Native American Indian Organizations consulted about this project along with their responses and comments.

11. The DEA should address the Graves and Repatriation Act – (NAGPRA) to identify National Register-eligible archaeological sites; to ensure proper evaluations are carried out in order to minimize the adverse impacts to historic properties in the project areas; and so that in the event burials are located during ground-disturbing activities, the proper procedures for unexpected discoveries are followed.

12. The FEIS should discuss in some detail if there was any EJ community involvement, follow-up analyses, and/or outreach efforts performed. Also, what impact will the project have on minority businesses?

13. In addition to the noise analyses to be done related to the entire site, the DEA should also discuss what noise effects can be attributed to the temporary (state type and length of time) demolition and construction that will take place on the site.

14. The DEA should establish the contractor's procedures for borrow materials which should be according to local and state soil conservation rules and regulations to ensure the quality of the fill to be used and where the fill is borrowed from (to ensure protection of that environment).

15. If there are any reasons to expect the contractor to encounter any contaminated soils, this should be discussed in detail in the DEA and the proper studies of the site should be done along with the corrections before any work on the project is done by the contractor.

In addition, contaminated soils, solid wastes, chemicals and hazardous materials should be properly handled by licensed contractors and disposed in licensed sanitary landfills according to the type of waste; that chemicals and hazardous material be disposed of according to local, state, Federal and Clean Water Act (including RCRA and CERCLA) rules, regulations, guidelines and requirements.

16. The DEA should address handling of above ground/underground storage tanks (AST/UST), if any, according to the State and Federal rules regulations and guidelines. The DEA should address the issue of removing or not removing them and should include state and federal documentation concurring/not concurring with the final decision.

17. The DEA should address the potential for impacts from air toxics associated with the project.

18. In general, construction activities should be restricted to existing rights-of-way, if possible and best management practices should be utilized. Impacts to wetlands, floodplains, and other sensitive resources should be avoided. If avoidance is not possible, mitigation must be offered to minimize adverse impacts. If construction must run through a wetland, the area should be restored to its "natural" state. That is, the affected area should be returned to its original soil horizon as well as original contours. Also, the area should be re-vegetated with indigenous species.

If structures must be placed in a floodplain, they should be constructed to minimize the infiltration/inflow (I/I) of flood waters and should be sturdy enough to withstand the uplift and velocity forces of such waters. To minimize impacts to prime farmland and public health, water and sewer lines should not run directly through fields or obstruct the flow of water to crops. The land should be returned to its original contour and re-vegetated with indigenous plant life. Ancillary facilities (e.g., pump stations) should be designed so not to impede the natural flow of flood waters.

Since soil disturbance associated with the demolition and construction would require disturbance to the existing site soils topography it could generate considerable amounts of storm water, erosion and environmental harm, the owner should require and monitor the contractor to apply stringent controls to minimize potential adverse impacts on wetlands, groundwater, aquifers, creeks/rivers, lakes, ponds, reservoirs, and water quality per local and state erosion and sediment rules and guidelines; the Clean Water Act; the required state and COE permits; the Executive Order 11988 - Flood Plain Management and the Executive Order 11990 - Protection of Wetlands. Runoff controls should be updated periodically for the duration of the construction (e.g., every 2-3 months) and maintained to help ensure success (e.g., silt fences emptied and hay bales replaced).

19. The DEA should include the latest cumulative impacts (past, present and future and also the total direct and indirect impacts) analysis as they affect the air quality in the area.

20. The owner should encourage the contractors to maintain and operate all construction equipment per manufacturer's specifications and recommendations to minimize air emissions. The owner should also consider offering incentives for contractors to specify the use of retrofitted diesel equipment or purchase of available ultra-low diesel fuel in their bids. The DEA should address the impact of the construction on the air quality if some of the construction could be done at night.

21. The long-term and indirect impacts of the proposed action should be considered. If the extension of service to the proposed users could cause further development of an environmentally sensitive area, alternate alignments/sites should be considered.

22. The EPA suggests the recommendations made by **Green Building** to be followed whenever possible. **Green or sustainable building is the practice of creating healthier and more resource-efficient models of construction, renovation, operation, maintenance, and demolition.** Research and experience increasingly demonstrate that when buildings are designed and operated with their lifecycle impacts in mind, they can provide great environmental, economic, and social benefits. **Elements of Green building** include:
*Smart Growth and Sustainable Development *Energy Efficiency and Renewable Energy
*Water Stewardship *Environmentally Preferable Building Materials and Specifications *Waste Reduction *Toxics and *Indoor Environments.

1 Additional information on **Green Building** can be found at:
<http://www.epa.gov/greenbuilding/>
<http://www.greenbuilding.com/>
www.epa.gov/greenbuilding
www.greenhighways.org

<http://www.usgbc.org/>
www.greenseal.org

2 Other links

Waste Reduction Resource Center - hosted by North Carolina but it is an EPA Region 4 resource
- <http://wrrc.p2pays.org/>

Industrial materials - <http://www.epa.gov/osw/conservation/rrr/imr/index.htm>

http://www.fema.gov/plan/prevent/fhm/dl_zone.shtm

C&D - <http://www.epa.gov/osw/conservation/rrr/imr/cdm/>
www.epa.gov/nscep/